



Data Protection Impact Statement

January 2025

Name of controller	Bradwell Parish Council
	Town Bottom Toilets
Name of controller contact	Vanessa Ball parishclerk@bradda.org 07730370759

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. Summarize why you identified the need for a DPIA.

Bradwell Parish Council has identified this need for a DPIA for the installation of a closed-circuit television (CCTV) system on the building of Town Bottom Toilets. Town Bottom Park, its playing fields and toilets are open to the public 365 days a year, they are owned and maintained by Bradwell Parish Council, the CCTV will be used for public monitoring purposes for the prevention and detection of crime and vandalism inside the toilets and surrounding area. The cameras will be on the outside of the building only.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone?

Data will be collected by recordings of images; this data will only be used in the event of a crime or act of vandalism on the building and will be shared with the police for this purpose only. The CCTV will not be viewed at any other time. The data will be stored for 30 days before being erased completely. Any copies taken for crime purposes will be recorded by the clerk to the council and then handed to the police, there will be no other copies stored. Data may be viewed by the CCTV

installer in the case of malfunction or if emergency repairs are required. The CCTV system will be kept in a locked cabinet and will not be available to the public.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Are there any current issues of public concern that you should factor in?

Bradwell Parish Council have no specific relationship with any individual. The main purpose of the CCTV is to protect property and to ensure the safety of the users of the toilets and playing fields. Criminal damage caused by individuals to the toilets and property on council land has occurred, and repairs have been made which are costly. CCTV recording will act as a deterrent and will enable identification of individuals by the police and action can be taken to prevent the recurrence of such crime.

The data will not be used in any way other than for the prevention and detection of crime, therefore there is no concern. There will be children and vulnerable groups using the facilities, however there are no safeguarding issues, unless these groups are involved in a crime or act of vandalism in which CCTV will then need to be viewed.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

Bradwell Parish Council wishes to provide a safe and harmonious environment at Town Bottom playing field. The toilets have been previously locked in the evenings to prevent criminal damage, the council would like to be able to keep the toilets open all year round, to enable all visitors to the village at any time of day to be able to use the facilities.

Other benefits of a CCTV system include enabling visitors to the area to feel safe and secure whilst using the facilities, and the proprietors of the adjacent Café can run their business without fear of damage to their property.

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation?

Bradwell Parish Council resolved at the meeting of to install CCTV to their property. Residents living in nearby properties will be consulted via a letter delivered to their homes, and a CCTV policy will be available for viewing on the village website. The CCTV will not be facing into any private or residential property, it is mainly for the purpose of crime prevention on Town Bottom Land.

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply?

Bradwell Parish Council have invested in additional lighting to the property, however, must be mindful of the disruption this caused to neighboring properties, a mosquito style deterrent alarm was considered but was decided against due to the impact this could cause to nearby residents and animals.

The toilets are provided for public use and have been closed in the evenings to prevent damage; this is having an effect on a nearby pub who is seeing an influx of the public simply wanting to use the bathroom.

The CCTV processing will achieve the purpose of being able to keep the toilets open without the risk of damage, and if any vandalism does still occur CCTV images will help to identify the criminals.

Signage will be provided so that all users of Town Bottom will be aware that they are being subjected to CCTV recording, subject access requests can be made in writing to the clerk if anyone wishes to view their personal data. The CCTV will be installed to GDPR and data protection legislations and requirements.

Bradwell Parish Council will be registered with the Information Commissioners Office and this is renewed annually.

A CCTV policy will be available for viewing, alongside council data protection and retention policies. The processors will receive full training, a copy of the DPIA and CCTV policy. There will only be two users of the system, the clerk and one other Councillor.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.

Source of risk and nature of potential impact on individuals.	Likelihood of harm Remote, possible or probable	Severity of harm Minimal, significant or severe	Overall risk Low, medium or high
Views into neighbouring properties on Brookside	Possible	Significant	Medium
Views into neighbouring properties on Towngate	Possible	Significant	Medium
Views into neighbouring properties on Bridge Street	Possible	Significant	Medium
Viewing footage by unauthorised third party	Remote	Minimal	Low
Data retained longer than required legally	Possible	Minimal	Low

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

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Risk	Options to reduce or eliminate risk	Effect on risk Eliminated, reduced or accepted	Residual risk Low, medium, high	Measure approved Yes/No
Views into neighbouring properties on Brookside,	Adjust range of cameras and privacy masking	Eliminated	Low	Yes- agreed with installer to point down.

Towngate and Bridge Street.				
Viewing footage by unauthorised users	Authorised access only following incident permitted in accordance with the CCTV Code of Practice and the provision of the Data Protection Act 2018	Reduced	Low	Yes
	In every case, a written application in an approved format must be submitted to the Parish Clerk in accordance with the Subject Access Request	Reduced	Low	Yes
	Police to ensure validity of evidence and accuracy of data/image for purposes of crime prevention	Accepted	Low	Yes
Data retained longer than required legally	Ensure technology is adequate and working- include on a monthly maintenance contract.	Reduced	Low	Yes

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Bradwell Parish Council	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Bradwell Parish Council	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	N/A	DPO should advise on compliance, step 6 measures and whether processing can proceed
Consultation responses reviewed by:	Parish Clerk	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	Parish Clerk	This will be reviewed annually